

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK

In re:

KRIS DANIEL ROGLIERI,

Case No. 24-10157
Chapter 11

Debtor.

**NOTICE OF APPEARANCE AND DEMAND
FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE, that the undersigned, appearing for Paul A. Levine, as Receiver for Prime Capital Ventures, LLC, Berone Capital Fund, LP, Berone Capital Partner, LLC, Berone Capital LLC, Berone Capital Equity Fund I, LP, 405 Motorsports LLC f/k/a Berone Capital Equity Partners, LLC (the "Receiver"), pursuant to Bankruptcy Rules 2002, 9007 and 9010, hereby requests that all notice given to or required to be served in this case be given and served upon the undersigned at the office, address and telephone number set forth below.

PLEASE TAKE FURTHER NOTICE, that the foregoing demand includes not only the notice and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any applications, motions, petitions, pleadings, complaints or demands transmitted or conveyed by mail delivery, telephone, telex or otherwise, which affect the Debtor or property of the Debtor or the Receiver.

PLEASE TAKE FURTHER NOTICE, that the undersigned hereby demands that the name and address set forth herein be added to the mailing matrix in this case.

PLEASE TAKE FURTHER NOTICE, that the Receiver intends that neither this Notice of Appearance, nor any former or later pleading, claim or suit shall waive (1) Receiver's right to have final orders in non core matters entered only after *de novo* review by a District Court Judge, (2) Receiver's right to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related in this case, (3) Receiver's right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal, or (4) any other rights, claims actions, defenses, setoffs, or recoupments to which Receiver is or

may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Receiver expressly reserves.

Dated: February 15, 2024

Respectfully submitted,

/s/Paul A. Levine

Paul A. Levine, Esq.
LEMERY GREISLER LLC
Office and P.O. Address
677 Broadway, 8th Floor
Albany, New York 12207
(518) 433-8800

*Attorneys for Paul A. Levine, as Receiver of
Prime Capital Ventures, LLC, Berone
Capital Fund, LP, Berone Capital Partner,
LLC, Berone Capital LLC, Berone Capital
Equity Fund I, LP, 405 Motorsports LLC
f/k/a Berone Capital Equity Partners, LLC*